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16 Secretary of Labor

17 **UNITED STATES DISTRICT COURT**
18 **FOR THE DISTRICT OF NEVADA**

19 **Julie A. Su**, Acting Secretary of Labor, United
20 States Department of Labor,

21 Plaintiff,

22 v.

23 **Colvin Construction, Inc., and Michael Colvin,**

24 Defendants.

25 Case No.: 2:22-cv-1811

26 **STIPULATION TO EXTEND
27 TIME TO RESPOND TO
DEFENDANTS'
MOTION TO DISMISS
RETALIATION CLAIM
AND TO EXTEND
TIME TO RESPOND TO
DEFENDANTS'
MOTION FOR MORE DEFINITE
STATEMENT
(First Request)**

28 STIPULATION TO EXTEND TIME FOR SECRETARY TO RESPOND TO MOTION TO
DISMISS AND MOTION FOR MORE DEFINITE STATEMENT
Case No. 2:20-cv-1811

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3 The parties, by and through undersigned counsel, hereby stipulate as follows:
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- 7 1. On October 16, 2023, Defendants filed a Motion to Dismiss Plaintiff's
8 Retaliation Claim (ECF No. 42) and a Motion for a More Definite Statement
9 (ECF No. 43).
- 10 2. The parties met and conferred and are attempting to resolve the issues raised in
11 Defendants' motions. The parties therefore agree to extend the Acting
12 Secretary's deadline to respond to ECF Nos. 42 and 43 by two-weeks, with a
13 new response deadline by November 13, 2023.
- 14 3. The parties agree that Defendants' reply to the Acting Secretary's responses
15 shall also be extended one week, with a new reply deadline by November 20,
16 2023.

17 Respectfully submitted this 30th day of October, 2023.

18 FOR THE SECRETARY

19
20 Seema Nanda
21 Solicitor of Labor

22 Marc A. Pilotin
23 Regional Solicitor

24 Boris Orlov
25 Counsel

26 /s/ Julia B. Hayer
27 Paige B. Pulley
Julia B. Hayer
Trial Attorneys
Attorneys for Secretary of Labor
U.S. Department of Labor

28 STIPULATION TO EXTEND TIME FOR SECRETARY TO RESPOND TO MOTION TO
DISMISS AND MOTION FOR MORE DEFINITE STATEMENT
Case No. 2:20-cv-1811

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2 FOR THE DEFENDANTS

3 /s/ Kristol B. Ginapp
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Kristol Bradley Ginapp
Shareholder
Holley Driggs

7 IT IS SO ORDERED:
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James C. Mahan
12 UNITED STATES DISTRICT
13 JUDGE JAMES C. MAHAN
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Dated: October 30, 2023

28 STIPULATION TO EXTEND TIME FOR SECRETARY TO RESPOND TO MOTION TO
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